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Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$85,245.00 IN U.S.
CURRENCY,

Defendant.

2:21-MC-00218-WBS-AC

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimant Shalom Ifrah ("Ifrah"), by and through their respective counsel, as follows:

1. On or about June 15, 2021, claimant Ifrah filed a claim in the administrative forfeiture proceedings with the Federal Bureau of Investigation with respect to the Approximately \$85,245.00 in U.S. Currency (hereafter "defendant currency"), which was seized on March 22, 2021.

2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
2 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of
3 the parties. That deadline was September 13, 2021.

4 4. By Stipulation and Order filed September 14, 2021, the parties stipulated to extend to
5 December 13, 2021, the time in which the United States is required to file a civil complaint for
6 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
7 currency is subject to forfeiture.

8 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
9 extend to February 11, 2022, the time in which the United States is required to file a civil complaint for
10 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
11 currency is subject to forfeiture

12 5. Accordingly, the parties agree that the deadline by which the United States shall be
13 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
14 alleging that the defendant currency is subject to forfeiture shall be extended to February 11, 2022.

15 Dated: 12/13/2021

PHILLIP A. TALBERT
Acting United States Attorney

17 /s/ Kevin C. Khasigian
18 KEVIN C. KHASIGIAN
Assistant U.S. Attorney


20 Dated: 12/13/2021

21 /s/ Sandra R. Brown-Bodner
22 SANDRA R. BROWN-BODNER
EVAN J. DAVIS
HOCHMAN SALKIN TOSCHER
PEREZ P.C.
Attorney for Shalom Ifrah

(Authorized via email)

26 IT IS SO ORDERED.

27 Dated: December 14, 2021

28 
WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE